

April 2, 2012

#### **VIA ECFS**

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Room TW-A325 Washington, DC 20554

Re: WC Docket Nos. 09-197, 11-42 - Compliance Plan of OneLink Wireless,

LLC

Dear Ms. Dortch:

On behalf of OneLink Wireless, LLC ("OneLink") and in accordance with the Commission's recent Lifeline Reform Order and Public Notice, attached please find OneLink's Compliance Plan.

OneLink requests expedited approval of its Compliance Plan in order to enable it to participate in the Commission's broadband pilot program, described in the Lifeline Reform Order.

Should you have any questions concerning this matter, please do not hesitate to contact the undersigned.

Respectfully submitted,

Michael P. Donahue

Counsel for OneLink Wireless, LLC

**Enclosures** 

cc (via email): Garnet Hanly

Divya Shenoy

### Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of	)	
Lifeline and Link Un Deform and	)	WC Docket No. 11-42
Lifeline and Link Up Reform and Modernization	)	WC DOCKET NO. 11-42
	)	
Telecommunications Carriers Eligible	)	WC Docket No. 09-197
To Receive Universal Service Support	)	

#### ONELINK WIRELESS, LLC COMPLIANCE PLAN

OneLink Wireless, Inc. ("OneLink" or the "Company") is a prepaid wireless carrier seeking designation as an eligible telecommunications carrier ("ETC") for the limited purpose of offering service supported by the Lifeline program.<sup>1</sup> In its recent *Lifeline Reform Order*,<sup>2</sup> the Commission granted forbearance from the "own-facilities" requirement of Section 214(e)(1)(A) of the Communications Act of 1934, as amended, to carriers seeking Lifeline-only ETC designation subject to certain conditions. Specifically, the Commission provided that a carrier seeking to become a Lifeline-only ETC must comply with certain 911 and enhanced 911 requirements and obtain Wireline Competition Bureau ("Bureau") approval of a compliance plan "providing specific information regarding the carrier's service offerings and outlining the measures the carrier will take to implement the obligations contained in [the] Order."<sup>3</sup> The Bureau subsequently issued a Public Notice

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<sup>&</sup>lt;sup>1</sup> OneLink currently has a petition pending for designation as an ETC in certain states and seeks authorization to provide Lifeline-only service to Tribal lands. *See* Petition of OneLink Wireless, LLC for Designation as an Eligible Telecommunications Carrier in Alabama, New York, North Carolina, and Virginia, WC Docket No. 09-197 (filed Feb. 28, 2011) ("Petition"). In its Petition, OneLink requested ETC designation for the purposes of offering both Lifeline and Link-Up services to end users in those states. OneLink respectfully requests to incorporate the commitments made herein into the pending Petition, and by this Compliance Plan to amend its Petition to request ETC designation for the limited purpose of providing Lifeline services.

<sup>&</sup>lt;sup>2</sup> See Lifeline and Link Up Reform and Modernization et al, WC Docket No. 11-42 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) ("Lifeline Reform Order").

<sup>&</sup>lt;sup>3</sup> Lifeline Reform Order ¶ 368.

providing guidance for the submission of compliance plans pursuant to the *Lifeline Reform Order*.<sup>4</sup> OneLink would like to avail itself of the grant of forbearance from the facilities requirement, and accordingly hereby files this Compliance Plan outlining the measures it will take to implement the obligations contained in the *Lifeline Reform Order*.

#### **Background**

OneLink offers affordable and reliable telecommunications services to low income end-user customers. OneLink's prepaid wireless services combined with free handsets provide a reasonable alternative to traditional post-paid services. OneLink provides low income customers who might not otherwise be able to afford traditional services with dependable voice and data services, as well as additional features and functionalities, including call waiting, caller ID and voicemail.

OneLink was formed in November 2010 to offer prepaid wireless services to low-income customers. OneLink is a wholly owned subsidiary of OneLink Communications, Inc. ("OneLink Communications"), a residential long distance reseller formed in January 2001. OneLink's parent company has been offering resold residential long distance services in 30 states<sup>5</sup> since its formation. In addition OneLink Communications has offered resold long distance services to businesses for more than two years.

OneLink offers simple and easy-to-understand prepaid wireless services throughout the United States using Sprint-Nextel's nationwide network. OneLink's products include mobile plans that provide a set amount of minutes of voice calling, text messaging and web services for a flat fee, a mobile handset, local and nationwide calling, and access to a live operator. In addition to its pending applications for ETC designation with the FCC and states, OneLink is registering with a

<sup>&</sup>lt;sup>4</sup> See Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order, Public Notice, DA 12-314 (rel. Feb. 29, 2012).

<sup>&</sup>lt;sup>5</sup> OneLink Communications offers service in the following states: Arizona, Arkansas, California, Colorado, the District of Columbia, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Louisiana, Maryland, Massachusetts, Michigan, Nebraska, Nevada, New Jersey, New Mexico, New York, North Carolina, Ohio, Oregon, Pennsylvania, South Carolina, Texas, Utah, Virginia and Washington.

number of states to provide non-Lifeline, prepaid wireless services. OneLink has not been subject to enforcement actions in any state.

Expanding the Lifeline programs to include broadband will help ensure that all Americans have access to affordable and reliable advanced telecommunications services. OneLink is looking at several options to ensure that it can provide customers with the resources they need in order to succeed in today's high tech environment. OneLink is working with technical partners to develop a high bandwidth, low cost, broadband product. OneLink would like to play a role in achieving the goal of ensuring that all Americans have access to affordable and reliable advanced telecommunications services. To that end, OneLink would like to participate in the Broadband Pilot Program being initiated by the Commission in accordance with the National Broadband Plan.<sup>6</sup>

#### Compliance Plan

#### I. Certification and Verification Procedures

OneLink will comply with all certification and verification requirements for Lifeline eligibility set forth in the *Lifeline Reform Order*, the Commission's Lifeline rules and policies, the provisions of this Compliance Plan, and all laws and regulations governing OneLink's provision of Lifeline-supported prepaid wireless services to customers throughout the United States. This Compliance Plan sets forth the specific measures that OneLink intends to implement to comply with the Commission's new rules relating to determinations of subscriber eligibility for Lifeline services, including all of the consumer eligibility, consumer enrollment, and re-certification procedures.

OneLink will comply with all certification and verification requirements for Lifeline eligibility established by states where it is designated as an ETC. In states where there are no state-imposed requirements, no established rules or procedures in place, or in states that do not mandate Lifeline support, OneLink will obtain certification of eligibility at the outset and will verify consumers' Lifeline eligibility in accordance with the Commission's requirements. OneLink shares the Commission's

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<sup>&</sup>lt;sup>6</sup> Federal Communications Commission, Omnibus Broadband Initiative, Connecting America: The National Broadband Plan (2010), available at <a href="http://www.broadband.gov/plan">http://www.broadband.gov/plan</a>.

concerns about the potential abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent OneLink's customers from engaging in such abuse of the program, inadvertently or intentionally.

OneLink will implement certification procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to OneLink employees or agents by contacting the Company in person or via telephone, facsimile or the Internet. At the point of sale, consumers will be provided with printed information describing OneLink's Lifeline program, including eligibility requirements, and with instructions for enrolling. Consumers will be enrolled in person or directed, via company literature, collateral or advertising, to a toll-free number and to the Company's website, which will contain a link to information regarding the Company's Lifeline service plans, including a detailed description of the program and state-specific eligibility criteria. OneLink's application form will identify that it is a "Lifeline" application. Except in states in which applicants are enrolled through a designated state agency, OneLink will have direct contact with all customers applying for Lifeline service, either in person through its employees, agents or representatives, or via the telephone (including facsimile) or mail. OneLink will provide Lifeline-specific training to all personnel, whether employees, agents or representatives, who interact with actual or prospective consumers with respect to obtaining, changing or terminating Lifeline services.

OneLink personnel will take steps to ensure that applicants are eligible to participate in the Lifeline program. All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on state-specific income-based or program-based criteria. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies state-specific eligibility requirements using state-specific checklists. OneLink will establish policies and procedures to review such documentation and keep accurate records detailing how the consumer demonstrated his or her eligibility, including collecting information on the enrollment form about what documentation the applicant presented to demonstrate program-based or income-based

eligibility. Where OneLink personnel conclude that proffered documentation is insufficient to establish such eligibility, OneLink will deny the associated application and inform the applicant of the reason for such rejection. In the event that OneLink personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel at OneLink's corporate headquarters.

Consumers who do not complete the application process in person must return the signed application and supporting documentation to the Company by mail, fax, email or other electronic transmission. The Company will accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 U.S.C. §§ 7001-7006, and any applicable state laws, and may verify consumers' signatures via interactive voice response ("IVR") systems. Processing of consumers' applications, including review of all application forms and relevant documentation, will be performed under the Company's supervision by managers experienced in the administration of the Lifeline program.

OneLink will provide substantially the following information in clear, easily understandable language on its initial and annual Lifeline certification forms:<sup>7</sup>

#### Household information

The certification form will request the Lifeline subscriber's name and address information. Prior to providing service to a consumer, OneLink will collect a residential address, which the subscriber must indicate is his or her permanent address, and a billing address if that address differs from the residential address. OneLink will not accept a P.O. Box number as a residential address, but may accept a P.O. Box as a billing address. OneLink will set forth on the certification form the requirement that the subscriber must provide any new address to OneLink within 30 days of moving. If a subscriber does not have a permanent residential address, OneLink will require the subscriber to provide an address that could be used to perform a check for duplicative support.

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<sup>&</sup>lt;sup>7</sup> A copy of OneLink's certification form is attached hereto at Attachment A.

Upon receiving an application for Lifeline support, OneLink will check the duplicates database, when it becomes available, to determine whether an individual at the applicant's residential address is currently receiving Lifeline-supported service. OneLink will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at that residential address. If no one at the residential address is currently receiving Lifeline-supported service, OneLink may initiate Lifeline service after determining that the household is otherwise eligible to receive Lifeline and obtaining all required certifications from the household. If OneLink determines that an individual at the applicant's residential address is currently receiving Lifelinesupported service, OneLink will collect from the applicant upon initial enrollment and annually thereafter a worksheet that (1) explains the Commission's one-per-household rule; (2) contains a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) provides a space for the applicant to initial or certify that he or she shares an address with other adults who do not contribute income to the applicant's household and/or share in the household's expenses; and (4) notifies applicants of the one-per-household certification requirement and the penalty of de-enrollment for a consumer's failure to make the required oneper-household certification.

OneLink (or the state agency or third-party responsible for Lifeline enrollment in a state) will obtain a certification from the subscriber at sign up and annually thereafter attesting under penalty of perjury that the subscriber's household is receiving no more than one Lifeline-supported service. In addition, the certification form will include a space for the subscriber to separately acknowledge that, to the best of his or her knowledge, no one at the consumer's household is receiving a Lifeline-supported service from any other provider. The certification form will explain in clear, easily understandable language that (1) Lifeline is a federal benefit; (2) Lifeline service is available for only one line per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; and (4) households are not permitted to receive benefits from multiple providers. The

certification form will also contain clear, easily understandable language stating that violation of the one-per-household requirement would constitute a violation of the Commission's rules and would result in the consumer's de-enrollment from the program, and potentially, prosecution by the United States government.

Eligibility Information for Initial and Annual Certification Forms

OneLink's certification form will ask for the Lifeline subscriber's date of birth and the last four digits of the subscriber's social security number. The certification form will be written in clear, easily understandable language and will include a place for the customer to sign under penalty of perjury attesting to his or her eligibility for Lifeline. OneLink (or the state Lifeline program administrator, where applicable) will obtain the consumer's signature certifying under penalty of perjury that: the consumer either participates in a qualifying federal program or meets the income qualifications to establish eligibility for Lifeline; the consumer has provided documentation of eligibility, if required to do so; the consumer attests that the information contained in his or her application is true and correct to the best of his or her knowledge and acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law. The certification form will explain that Lifeline is a government benefit program and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. The certification form will include space for consumers qualifying for Lifeline under an income-based criterion to certify the number of individuals in their household. OneLink (or the state administrator, where applicable) will obtain the consumer's initials or signature on the certification

<sup>&</sup>lt;sup>8</sup> OneLink will not retain copies of eligibility documentation, but rather will maintain accurate records detailing how the customer demonstrated his or her eligibility. OneLink will check the eligibility of consumers seeking to enroll in Lifeline either by accessing electronic eligibility databases, where available, or by reviewing documentation from the consumer demonstrating his or her eligibility for Lifeline service. Where the Company is able to access a state or federal database to make determinations about customer eligibility, the Company or its representative will note in its records what specific data was relied upon to confirm the consumer's initial eligibility for Lifeline. In instances where a state agency or third-party administrator is responsible for the initial determination of consumer eligibility, OneLink will rely on the state identification or database.

form acknowledging that the consumer may be required to re-certify his or her continued eligibility for Lifeline at any time, and that failure to do so will result in the termination of the consumer's Lifeline benefits.

The certification form will notify the consumer using clear, easily understandable language that he or she must inform OneLink within 30 days if (1) the consumer ceases to participate in a federal qualifying program or programs or the consumer's annual household income exceeds 135% of the Federal Poverty Guidelines; (2) the consumer is receiving more than one Lifeline-supported service; or (3) the consumer, for any other reason, no longer satisfies the criteria for receiving Lifeline support. Additionally, the certification form will require the consumer to certify and attest under penalty of perjury that he or she understands the notification requirement, and that he or she may be subject to penalties for failure to follow this requirement. The certification form will inform consumers that Lifeline service is a non-transferable benefit, and that a Lifeline subscriber may not transfer his or her service to any other individual, including another low-income consumer.

The certification form will explain in clear, easily understandable language, that the subscriber's name, telephone number, and address will be divulged to the Universal Service Administrative Company or its agents for the purpose of verifying that the subscriber does not receive more than one Lifeline benefit, and will contain a space for the subscriber to acknowledge and consent to this use of the information.

#### Annual Re-Certification of Consumer Eligibility for Lifeline

OneLink will require every customer enrolled in the Lifeline program to verify on an annual basis that he or she receives Lifeline-supported service only from OneLink and, to the best of his or her knowledge, no one else in the subscriber's household is receiving a Lifeline-supported service. This re-certification may be done on a rolling basis throughout the year. Where ongoing eligibility cannot be determined through access to a qualifying database either by the Company or the state, and there is no state administrator verifying the continued eligibility of Lifeline subscribers, the Company will recertify the continued eligibility of all of its subscribers by contacting them—either in

person, in writing, by phone, by text message, by email, or otherwise through the Internet—to confirm their continued eligibility. Such certifications may be obtained through a written format, an IVR system, or a text message, in accordance with the Order. In states where a state agency or a third party has implemented a database that carriers may query to recertify the consumer's continued eligibility, the Company (or state agency or third party, where applicable) will instead query the database and maintain a record of what specific data was used to re-certify eligibility and the date of recertification.

OneLink will notify each of its Lifeline consumers by mail that he or she must confirm his or her continued eligibility in accordance with the applicable requirements. The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact OneLink. OneLink will provide written notice of impending service termination to subscribers who do not respond to the annual re-certification within 30 days. Any subscriber who does not respond to the impending termination letter within 30 days to demonstrate that his or her Lifeline service should not be terminated will be de-enrolled from the Company's Lifeline program.

OneLink will recertify the eligibility of its Lifeline subscriber base as of June 1, 2012 by the end of 2012 and report the results to USAC by January 31, 2013. Decifically, by the end of 2012, OneLink will provide to each Lifeline subscriber enrolled in the program as of June 1, 2012, a recertification form (unless applicable to the state Lifeline administrator) on which the subscriber can attest to their continued eligibility for Lifeline. This form will collect all of the subscriber information noted above on the initial certification form, including an updated address. OneLink will permit subscribers to provide their re-certification in writing, by phone, by text message, by email, or otherwise through the Internet. Alternatively, if a database containing consumer eligibility is available, OneLink (unless applicable to the state Lifeline administrator) will query the database by the end of 2012 and maintain a record of what specific data was used to re-certify the consumer's

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<sup>&</sup>lt;sup>9</sup> See Lifeline Reform Order ¶¶ 130, 132.

<sup>&</sup>lt;sup>10</sup> Lifeline Reform Order ¶ 130.

eligibility and the date that the consumer was re-certified. OneLink (unless the requirement is applicable to the state administrator) will report the results of its re-certification efforts to USAC, the Commission, and the relevant state commission (where the state has jurisdiction over OneLink) by January 31, 2013. As applicable, OneLink will also provide re-certification results to the relevant Tribal government, for subscribers residing on reservations or Tribal lands. OneLink will remind consumers about the annual re-certification requirement on the certification form that is completed upon program enrollment and annually thereafter.

#### П. Public Safety and 911/E911 Access

In the Lifeline Reform Order, the Commission stated that forbearance from the "own-facilities" requirement is conditioned on a carrier seeking limited ETC designation "providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes [and] providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifelinesupported services" starting on the effective date of the Order. 11 Moreover, wireless resellers have an independent obligation to provide access to basic and E911 service, to the extent that the underlying facilities-based licensee has deployed the facilities necessary to deliver E911 information to the appropriate Public Safety Answering Point. 12 Resellers also have an independent obligation to ensure that all handsets or other devices offered to their customers for voice communication are location capable. 13

The Commission and consumers are hereby assured that all OneLink Lifeline customers will have available access to emergency calling services at the time that Lifeline service is initiated and that such 911 and E911 access will be available from OneLink handsets regardless of the activation status and availability of minutes. Further, OneLink will ensure that all handsets used in connection with the Company's Lifeline service offering are E911-compliant. In the event that an existing

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Lifeline Reform Order ¶ 373.
 See 47 C.F.R. § 20.18(m).

<sup>&</sup>lt;sup>13</sup> See id.

OneLink customer does not have an E911-compliant handset, the Company will replace it with a new 911/E911 compliant handset at no charge to the customer. Any new customer who qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911 compliant handset as well.

#### III. Compliance with Marketing and Disclosure Requirements

Within six months of the effective date of the Lifeline Reform Order, OneLink will implement the disclosure requirements for all of its marketing materials related to its Lifeline-supported services, including materials in all media, print, audio, video, Internet, and outdoor signage. In its Lifeline-related marketing materials, OneLink will explain in clear, easily understood language that the offering is a Lifeline-supported service; that only eligible consumers may enroll in the program; what documentation is necessary for enrollment; and that the program is limited to one benefit per household, consisting of either wireline or wireless service. OneLink will explain in its marketing materials that Lifeline is a government benefit program, and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. In all of its Lifeline-related marketing materials and advertising, OneLink will disclose the company name under which it does business and the details of its Lifeline service offerings.

#### IV. Additional Measures to Prevent Waste, Fraud and Abuse

#### A. Preventing Duplicate Lifeline Subsidies Within OneLink's Subscriber Base

Prior to requesting a subsidy, OneLink will process and validate its subsidy data to prevent duplicate same-month Lifeline subsidies. Any household that is already receiving a Lifeline subsidy will automatically be prevented from receiving a second lifeline subsidy in that same month. OneLink will immediately de-enroll any subscriber whom OneLink knows is receiving Lifeline-supported service from another ETC or knows is no longer eligible.

# B. Procedures For De-Enrolling Subscribers Receiving More Than One Lifeline Subsidy Per Household Or Otherwise No Longer Eligible For Lifeline

As noted above, at the time of enrollment and prior to initiating service for a customer, the Company will check the address of each Lifeline applicant against its database to determine whether or not it is associated with a customer that already receives OneLink Lifeline service, and will then review the application to ascertain whether the applicant is attempting to receive Lifeline-supported service for more than one handset associated with the address. If OneLink determines that an individual at the applicant's residential address is currently receiving Lifeline-supported service, the Company will take an additional step to ensure that the applicant and the current subscriber are part of different households. In order the make this demonstration, OneLink will require applicants to complete and submit to the Company a written document that will be developed by USAC as directed by the Commission in the *Lifeline Reform Order*. OneLink will deny the Lifeline application of any such individual residing at the same address as a current Lifeline subscriber who is part of the same household and will advise the applicant of the basis for the denial.

Where OneLink has a reasonable basis to believe that the subscriber no longer meets the Lifeline-qualifying criteria, including the one-per-household requirement, OneLink will send notification of impending termination in writing to the subscriber and allow the subscriber 30 days from the date of the impending termination letter in which to demonstrate continued eligibility. OneLink will immediately de-enroll any subscriber whom OneLink knows is receiving Lifeline-supported service from another ETC or knows is no longer eligible.

#### C. Usage Policy

OneLink will not seek universal service support for a qualifying low-income consumer until that individual subscriber uses the supported service to either activate the service or complete an outgoing call. In addition, OneLink will implement a usage policy whereby it will de-enroll Lifeline customers that have not used the Company's Lifeline service for a consecutive 60-day period. OneLink will notify its subscribers at service initiation about its usage requirements, and the de-

enrollment and deactivation that will result following non-usage in any 60-day period of time. OneLink will consider an account active if during any 60-day period an authorized subscriber either makes a monthly payment; purchases minutes from OneLink to add to an existing pre-paid Lifeline account; completes an outbound call; answers an incoming call from anyone other than OneLink, its representative, or agent; or affirmatively responds to a direct contact from OneLink confirming that he or she wants to continue receiving the Lifeline supported service. Deactivated customers may enroll again in the future and the balance of their minutes remaining prior to deactivation will be placed in their new account.

OneLink will update the database, when available, within one business day of de-enrolling a consumer for non-use. In addition, OneLink will report annually to USAC the number of subscribers de-enrolled for non-usage on a month-by-month basis along with OneLink's annual re-certification results.

#### D. Continued Functionality in Emergencies

Incorporating herein additional commitments OneLink has set forth in its Petition seeking designation as an ETC, as required by the newly amended Section 54.202 of the Commission's rules, <sup>14</sup> OneLink certifies that it will remain functional in emergencies <sup>15</sup> and that it will comply with consumer protection and service quality standards, <sup>16</sup> among other commitments.

#### E. Provision of Lifeline-Only Service to Residents of Tribal Lands

OneLink will comply with all of the Commission's requirements, rules and policies governing its provision of Lifeline service to eligible subscribers residing on reservations or Tribal lands. OneLink will submit all required information to the relevant Tribal governments, as applicable. As a provider of Lifeline service to residents of Tribal lands, OneLink certifies that it will pass through the full Tribal support amount to qualifying residents of Tribal lands, and under no circumstances will it collect from the Universal Service Fund more than the rate charged to Tribal subscribers.

<sup>47</sup> C.F.R. § 54.202.

<sup>15</sup> See Petition at 10-11, incorporated herein by reference.

<sup>16</sup> See id. at 11.

#### Conclusion

OneLink's Compliance Plan meets the conditions set forth in the Order and promotes public safety by ensuring that Lifeline customers have access to 911 and E911 service. OneLink requests that the Commission approve the Company's Compliance Plan and grant its pending ETC Petition so that OneLink may begin providing the benefits of Lifeline service to qualifying low-income consumers.

Respectfully submitted,

Michael P. Donahue Linda McReynolds

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Email: <a href="mpd@commlawgroup.com">mpd@commlawgroup.com</a> <a href="mpd@commlawgroup.com">lgm@commlawgroup.com</a>

Counsel for OneLink Wireless, LLC

April 2, 2012

## OneLink Wireless Lifeline Application and Certification Form

If you are currently receiving benefits from one or more of the programs listed below or your total household income is at or below 135% of the Federal Poverty Guidelines, you may be eligible for the Lifeline program.

Lifeline is a federal benefit. Lifeline assistance is only available for one subscription (either land line or cell phone) per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. Households are not permitted to receive benefits from multiple providers. Violation of the one-per-household requirement would constitute a violation of the Federal Communication Commission's rules and would result in your de-enrollment from the program, and potentially, prosecution by the United States government.

Please complete and sign the application and certifications below.

1.	APPLICANT INFORMATION (please print).				
	Last Name				
	First Name				
	Middle Name				
	(initial here)I understand that my name, telephone number and address will be divulged to the Universal Service Administrative Company or its agents for the purpose of verifying that I do not receive more than one Lifeline benefit. By initialing here, I acknowledge and consent to this use of my name, telephone number and address.				
	Date of Birth				
	Last 4 Digits of Social Security #(Applicants living on Tribal lands who lack a social security number may instead provide an official Tribal government identification card number.)				
	In order to meet State and Federal Regulations for determining eligibility for Lifeline-supported services, we must record your Date of Birth and the last 4 digits of your Social Security Number. The information is strictly confidential and will not be disclosed without your consent. All your personal information is encrypted using Secure Socket Layer (SSL) technology.				
	<ul> <li>Permanent residential address:</li> <li>PO Box numbers cannot be accepted. If you move, you must provide OneLink Wireless with your new address within 30 days of moving.</li> <li>If you do not have a permanent address, please supply a temporary address. The address below is a temporary address, initial here to acknowledge that you understand that OneLink Wireless will attempt to verify every 90 days that you continue to rely on that address, and that you must notify OneLink Wireless within 30 days of moving of a new address. If you do not respond to OneLink Wireless' address verification attempts within 30 days, your initials indicate that you understand that you may be de-enrolled from OneLink Wireless' Lifeline service.</li> <li>Residents of Tribal lands must provide a descriptive address if no street address is available.</li> </ul>				
	City, State, Zip				
	<b>Billing Address</b> (if different from permanent residential address): <i>PO Box number is acceptable for a billing address.</i>				
	Street or PO Box Number				
	City, State, Zip				
2.	QUALIFYING PROGRAMS (check all that apply)				
	Food Stamps # (Supplemental Nutrition Assistance Program)				

_	Federal Public Housing Assistance / Section 8	#	
_	Low Income Home Energy Assistance (LIHEAP)	#	
_	Supplemental Security Income (SSI)	#	
_	Medicaid	#	
_	Temporary Assistance to Needy Families (TANF)	#	
_	National School Free Lunch Program	#	
_	Food Distribution Program on Indian Reservations	#	
_	Bureau of Indian Affairs general assistance	#	
_	Tribally administered TANF or Head Start	#	
(i	init) I am seeking Tribal lands Lifeline support and certify that I reside	on Federally recognized Tribal lands.	
OR			
_	My total household income is at or below 135% of the Fed	deral Poverty Guidelines (FPG)	
_	Number of individuals in my household		
Pleas	se acknowledge your agreement by checking each box below a	and signing the application:	
	I meet the program-based or income-based qualifications to establish eligibility for Lifeline as indicated above and have provided documentation of eligibility as appropriate. If you elect to qualify via one of the above programs, you will need to prove your eligibility by providing us a copy of a document that proves your program participation.		
	I authorize OneLink Wireless to access any records required to verify my statements herein and to confirm my eligibility for the Lifeline program. I also authorize OneLink Wireless to release any records required for the administration of the Lifeline program.		
	I understand that I will be required to re-certify my continued eligibility for the Lifeline program at any time and on an annual basis and that failure to do so will result in termination of my Lifeline benefits.		
	I agree to notify OneLink Wireless within thirty (30) days if I cease to participate in the programs I listed above or if my annual household income exceeds 135% of the Federal Poverty Guidelines. I agree to notify OneLink if, for any other reason, I no longer satisfy the Lifeline eligibility criteria. I understand this notification requirement, and I understand that I may be subject to penalties if I fail to follow this requirement.		
	I understand that Lifeline assistance is only available for one subscription per household (either wireline or wireless, but not both). To the best of my knowledge, no one in my household is receiving a Lifeline-supported service from any other provider. I understand that I must notify OneLink Wireless within 30 days if I am receiving more than one Lifeline-supported service. I understand this notification requirement, and understand that I may be subject to penalties if I fail to follow this requirement, including de-enrollment from the program.		
	I understand that Lifeline service is a non-transferable benefit, and transfer his or her service to any other individual, including another		
corrections.	gning below, I attest under penalty of perjury that the information cont ct and acknowledge that providing false or fraudulent information to re I understand that Lifeline is a government benefit program and consur der to obtain the benefit can be punished by fine or imprisonment or ca	eceive Lifeline benefits is punishable by mers who willfully make false statements	
	Applicant Signature		
	Date of Signature		